

THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

IN RE:)
)
DONALD KEITH JOHNSON) Case No: 11-44920-drd13
NANCY ELIZABETH CHAMBERS)
)
Debtors.)

**MOTION TO RETAIN AND SPEND BONUS
AND NOTICE TO CREDITORS**

COME NOW the Debtors, DONALD KEITH JOHNSON and NANCY ELIZABETH CHAMBERS, by and through their attorney of record, Lorinda D. Walters, and for their Motion to Retain and Spend Bonus, state as follows:

1. The Debtors filed their Chapter 13 petition and Chapter 13 Plan and Plan Summary on October 21, 2011.
2. The Debtors' Chapter 13 Plan was confirmed on December 22, 2011.
3. On March 16, 2012, Debtor Nancy Chambers received a bonus from her employer in the sum of \$5,185.10. Taxes were withheld from said bonus in the sum of \$1,615.16, leaving a net amount of \$3,569.94.
4. The Debtors have incurred the following expenses:
 - a. The Debtors' hot water heater tank became inoperable, which necessitated the Debtors replacing said hot water heater on June 10, 2012. The cost of said replacement of a high efficiency hot water heater was \$1,858.02. A copy of the invoice is attached hereto.
 - b. Debtor Donald Johnson's 2001 Ford Ranger pickup truck was in need of certain repairs: On May 19, 2012, said Debtor replaced his coil pack for the

sum of \$74.32, and on June 7, 2012, said Debtor replaced his EGR valve for \$44.09. Debtor Donald Johnson performed the repairs himself.

c. Since the filing of the Debtors' bankruptcy petition, Debtor Nancy Chambers has incurred additional unexpected expenses related to her employment, even though her income has not increased. Said Debtor is required to make out of town trips for her employment, and has encountered the following increases in her job-related expenses: the price of gas has risen recently, the price of airline tickets has also risen, and said Debtor's employer is not reimbursing the Debtor for certain expenses as the employer has done in the past. In addition, said Debtor is now required to pay for her own seminar fees incurred during her mandatory out of town trips. These additional expenses have made it necessary to use said Debtor's bonus money to pay for the Debtors' June 2012 plan payment, in the sum of \$1,616.00.

5. The foregoing expenses are reasonable and necessary, and are not accounted for in the Debtors' budget.

6. The Debtors are in need of retaining and spending said bonus in the gross sum of \$5,185.10 minus taxes of \$1,615.16 for a total net sum of \$3,569.94 for the foregoing reasons.

WHEREFORE, the Debtors, DONALD KEITH JOHNSON and NANCY ELIZABETH CHAMBERS, by and through their attorney of record, Lorinda D. Walters, move the Court to allow the Debtors to retain and spend Debtor Nancy Chambers' bonus in the gross sum of \$5,185.10 minus taxes of \$1,615.16 for a total net sum of \$3,569.94, for the foregoing reasons.

WALTERS LEGAL SERVICES

/s/ Lorinda D. Walters _____
Lorinda D. Walters
Missouri Bar No. 27129
3000 N.E. Brooktree Lane
Suite 230
Kansas City, Missouri 64119
TEL: (816) 454-3000
FAX: (816) 454-4514
Attorney for Debtors

NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST

NOTICE IS GIVEN THAT:

Any Response to this Motion must be filed within twenty-one (21) days of the date of this notice with the Clerk of the United State Bankruptcy Court. Documents can be filed electronically at . A copy of such response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. If Debtor's counsel is not registered for electronic filing, you must serve the response by mail. If a Response is timely filed, a hearing will be held on a date and time determined by the Court. Notice of such hearing will be provided to all parties in interest. If no Response is filed within twenty-one (21) days, the Court will enter an Order granting the Motion.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Motion to Retain and Spend Bonus and Notice to Creditors was mailed this 22nd day of June, 2012, by first class mail, postage prepaid, to all creditors on the mailing matrix, and to all interested parties requesting notice.

/s/ Lorinda D. Walters _____

BOB HAMILTON
Plumbing + Heating + A/C
(913) 888-4-BOB
Fast, Friendly...Finally!

DATE: 10/6/2012	DS #: 1205106	
CUSTOMER NAME (Financially Responsible Party) Nancy Chambers		CALLER NAME
JOB CONTACT NAME		
JOB ADDRESS 106 NW 67 ST	CITY Gladstone	STATE MO
		ZIP 64118
BILLING ADDRESS (If Different)		PH1 PH2
E-MAIL ADDRESS		
1205106		SERVICE PARTNER MEMBER#
		<input type="checkbox"/> Var <input type="checkbox"/> Blk

ORIGINAL REASON FOR THE CALL

Pinkless water heater

SUMMARY:

12051018.3n

**See Summary of Findings sheet
for additional information**

WORK AUTHORIZATION: I, the undersigned, am owner/authorized representative/tenant of the premises at which the work above is being done. I hereby authorize you to perform the above recommendation, and to use such labor and materials as you deem advisable. Unless prior authorization for billing, payment for all work done is due upon completion (C.O.D.). A \$10.00 BILLING CHARGE is due thereafter. An office billing charge and/or finance charge of 1.75% per month (21% per annum) will be added after 10 days past due. I agree to pay reasonable attorney's fees, court costs and collection fees in the event of legal action. I have read this contract, including the terms and conditions on the reverse side hereof and agree to be bound by all the terms contained herein. All old parts will be removed from premises and discarded, unless otherwise specified herein.

I HEREBY AUTHORIZE YOU

For your peace of mind,
should the repair amount
exceed 25% of your system's
replacement value, our
technician is required to
inform you of options for
both repairing and replacing
the equipment.

Water Pressure

Pre-Approved Financing Terms:

Please pay from this invoice - Work performed C.O.D.

PAYMENT 1 Cash Check Check # _____
MC Visa Disc AmEx Auth # _____
Card #: _____

WANT TO PAY LESS

My Service technician presented me with a Service Partner Program and explained the benefits.

PAYMENT - 2 Cash Check Check #:
MC Visa Disc AmEx Auth #:
Card #:

I want to save money and become a Service Partner

SUBTOTAL		
DISC. 1		
DISC. 2		
TOTAL COST	1858.02	
ERVICE PARTNER SAVINGS	\$	

ACCEPTANCE OF WORK PERFORMED: I acknowledge satisfactory completion of the above described work and that the premises has been left in satisfactory condition. I understand that if my check does not clear, I am liable for the check and any charges from the bank. I agree to pay 1.75% per month for past due contracts (minimum charge \$15). In the event that collection efforts are initiated against me, I shall pay all associated fees at the posted rates as well as all cost of collection fees and reasonable attorney fees. I agree that the amount set forth in the space marked "TOTAL COST" is the total flat price I have agreed to.

SERVICE TECHNICIAN ACKNOWLEDGEMENT
Prior to the customer entering into the contract, I have discussed the nature of the service and cost and I have given a copy of the contract to the customer. All work I have done has been in compliance with company standards in a reasonable manner for our quality levels when applicable.

CUSTOMER SERVICE IS OUR #1 FOCUS

If you are not completely satisfied for any reason, please call and ask to speak with the Customer Service Manager. Your feedback is very important to us.

**THANK YOU FOR CHOOSING US FOR
YOUR SERVICE NEEDS!**



Service is our best part.

Store # 05081
(816) 420-8137
6527 N. OAK TRAFFICWAY
GLADSTONE MO 64118
6/07/2012 15:32:59 REG 01
Cashier: Shawn H.

ITEM	QTY	PRICE	TOTAL
EGR VALVE BWD		20470122	
EGR1300	1	\$44.09	\$44.09
1 YEAR REPLACEMENT IF DEFECTIVE			
Sub Total		\$44.09	
Total		\$44.09	
Cash		\$60.00	
CHANGE ===>		15.91	

Scan to RETURN items

Z2KG31BDSK1HNL



Transaction #2506

Thank you for shopping at Advance Auto Parts

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or

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interested in and follow the instructions to



Service is our best part.

Store # 05081
(816) 420-8137
6527 N. OAK TRAFFICWAY
GLADSTONE MO 64118
5/19/2012 16:01:34 REG 02
Cashier: Edgar G.

ITEM	QTY	PRICE	TOTAL
COIL IGNITION BWD		1B240280	
E260	1	\$68.99	\$68.99
LIMITED LIFETIME REPLACEMENT			
2001 Ford Ranger			
3.0L 183 - V6 FI - U			
Sub Total			\$68.99
T1 Tax @		7.7250%	\$5.33
Total			\$74.32
Cash			\$100.32
CHANGE ===>			26.00

Johnson, Don

Scan to RETURN items

Z2KFP1C1211HNL



Transaction #104

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interested in and follow the instructions to
apply!

\$

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